

Comments regarding NPRM on Broadband over Powerline Systems ET Doc No. 04-37

The Referenced NPRM does affirm the existing limitations regarding allowable interference generated by Part 15 Devices. It also continues the requirement that Part 15 devices must accept interference from licensed radio users.

A more basic question is why, with all the existing information already available, is the continued authorization of such a technology as “BPL” even being considered?

Technical Superiority? Just the opposite seems to be the result of tests.

Economic Benefits? The repeater costs, maintenance of interface with high voltage, and need for many users in a small area seem to indicate higher costs than existing available systems.

Unintended Consequences? The most obvious is the potential for interference with licensed services. What about others that may be discovered?

Urgent Need for Additional Broadband Providers? No real need exists. Fiber optics, DSL, Cable TV, and many Wireless Providers exist and seem to have saturated the market.

From long experience, Power Companies have a spotty record in clearing up existing interference caused by faulty connections and equipment. Some, such as the old Houston Lighting & Power and organization, did an excellent job because their communications superintendent for a time was a licensed radio amateur and had the expertise and equipment and motivation to quickly resolve problems. Others, particularly smaller companies such as the power company in Alamogordo, NM in the 60's, have neither the expertise nor the will to resolve problems. Will not BPL and its potential for several orders of magnitude greater for generating interference create worse problems for power companies? Can you imagine the finger pointing between the BPL group and the old power types as to who is causing a particular problem? Even within the same company.

As a registered Professional Engineer, Communications, if I had designed and built such a BPL system with the KNOWN potential for causing interference as well as unprotected susceptibility to interference, I could probably be sued for professional malpractice and lose!

Where are the Professional Engineers within the FCC who should be advising the FCC management to “Kill” the BPL snake before it multiplies and bites us all?

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